

APPENDIX A
ACTION MEMORANDUM

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
U.S. EPA Region VI
CERCLA Docket No. _____

APPENDIX B
LIST OF RESPONDENTS

Administrative Order on Consent for Removal Action
Gulfco Marine Maintenance Superfund Site
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CERCLA Docket No. _____

APPENDIX C
GULFCO MARINE MAINTENANCE SUPERFUND SITE MAP

Administrative Order on Consent for Removal Action
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APPENDIX D
STATEMENT OF WORK

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**STATEMENT OF WORK
GULFCO MARINE MAINTENANCE SUPERFUND SITE
REMOVAL ACTION and RI/FS**

I. INTRODUCTION

A. Purpose of the Statement of Work

This Statement of Work (SOW), sets forth certain requirements (“Work”) of the Administrative Order on Consent (AOC) for implementation of the Work, including, but not limited to development and implementation of a work plan to design and conduct a removal action (the "Removal Action") to remove or eliminate wastes, thereby eliminating or reducing risks from potential exposure pathways from those wastes at or from the Gulfco Marine Maintenance Superfund Site (the "Site"). The Work also includes the completion of a Remedial Investigation and Feasibility Study (RI/FS) for soil, sediment, and surface water located on that portion of the Site situated south of Marlin Ave. (the “Southern Area”). A site-wide RI/FS is currently being performed under the Unilateral Administrative Order (UAO), U.S. EPA Region 6 CERCLA Docket 06-05-05. The RI/FS activities previously accomplished under the UAO shall be incorporated into the RI/FS for the Southern Area where appropriate, and when completed and approved by EPA, the RI/FS Report for the Southern Area will be incorporated into and made part of the RI/FS for the entire site required under the UAO.

The fundamental requirements of the removal action are outlined in the Action Memorandum (the "Action Memorandum") dated _____. The work plan shall be subject to approval by EPA and shall be implemented by the Respondent (as defined in the AOC) upon EPA approval.

B. Description of Actions

- An aboveground storage tank farm (“AST Tank Farm”) located in the Southern Area are to be addressed by this Removal Action. The AST Tank Farm is a concrete bermed area containing about 15 aboveground storage tanks. The contents of the tanks are to be removed and the tanks demolished. The concrete containment slab and walls will remain in place, except that the walls shall be breached so that rainfall will freely drain from the structure. Any standing water contained within the bermed area shall be characterized and properly disposed off. Any buried pipes will be capped at the surface after removing the contents of the pipes. The tanks contents and structures, containerized wastes, and debris will be properly disposed of off-site after waste characterization.
- An RI/FS shall be completed for the Southern Area, which is that part of the Site located south of Marlin Ave, and adjacent to the Intracoastal Waterway. The

Southern Area RI/FS shall only address the soil, surface water, and sediment. The ground water RI/FS shall proceed as required pursuant to the UAO.

The specific objectives for the AST Tank Farm Removal Action is: (1) to prevent the release of chemicals of concern that are stored in the tanks and any other containers, and (2) to prevent the exposure of site workers and visitors to chemicals of concern remaining in the tanks following removal of the stored liquids and other materials. The tanks contain water, various organic phases, oily sludges, and sand, rust solids, and debris. The tank contents include benzene; chloroform; 1,2-dichloroethane; trichloroethylene; tetrachloroethylene; vinyl chloride; and petroleum hydrocarbons in various concentrations.

The specific objective for the RI/FS in the Southern Area is to determine the nature and extent of contamination in the area for the media described above, and the human health and ecological risks. The RI/FS shall also screen and evaluate alternative response actions to respond to unacceptable site risks.

II. WORK TO BE PERFORMED

A. Preconstruction Activities

Preconstruction activities will consist of a Site inspection and assessment, and preparation of a Removal Work Plan that addresses the requirements set forth in the Action Memo. Site inspection and assessment shall begin with cutting weeds and vegetation as necessary to perform a visual inspection of the Removal Action Areas. This inspection shall be performed by Respondents for safety purposes and to identify any drums or containers, which shall be visually inspected, inventoried, labeled with a control number, and logged, if not already done.

The Removal Work Plan shall describe the specific activities to be performed in removal and proper off-site disposal of the tanks and tank contents, containerized wastes, and any contaminated soil and debris from the Site. The Removal Work Plan shall include the following:

- **Quality Assurance Project Plan (QAPP)** - Describes the administrative management of the project including project personnel, authorities and responsibilities, and lines of communication. It will include sampling and analysis procedures including quality assurance/quality control, data validation and chain-of-custody. The Respondents shall refer to EPA's guidance documents titled "EPA Guidance for Quality Assurance Project Plans, EPA QA/G-5" (EPA 1998) and "EPA Requirements for Quality Assurance Project Plans, EPA QA/R-5" (EPA 2001).

All sampling and analyses performed pursuant to this Order shall conform to EPA direction, approval, and guidance regarding sampling, quality assurance/quality control ("QA/QC"), data validation, and chain of custody

procedures. Respondent shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with the appropriate EPA guidance. The existing Site QAPP may be updated as necessary to include the work to be performed.

- **Regulatory Compliance Plan** - Describes the Applicable or Relevant and Appropriate Requirements (ARARs) and the procedures for meeting the substantive requirements of any permits.
- **Waste Management Plan** - Describes procedures for sampling waste and the criteria for waste classification. The plan will also describe waste handling procedures, the layout for the waste staging and loading areas, and the procedures for manifesting and tracking the loads. Hazardous and non-hazardous wastes, as well as non-waste materials, shall be handled and managed in accordance with all applicable or relevant and appropriate requirements by the Respondents.

Although appropriate on-Site processing may be performed by the Respondents, contaminated liquids, sludges, debris, soils and any containerized wastes on Site shall be properly transported by the Respondents to authorized off-Site facilities for management and final disposal. Prior to shipping hazardous materials off-Site, the Respondents shall ensure that the requirements of the applicable U.S. Department of Transportation ("DOT") regulations contained in 49 C.F.R. 173, 178, and 179 are met, as well as any other applicable requirements. Prior to shipping hazardous materials off-Site, containers shall be labeled by the Respondents and the transporting vehicle placarded in accordance with the applicable portions of 49 C.F.R. 172 and any other applicable requirements.

Any off-Site disposal must be in compliance with ARARs, including those applicable or relevant and appropriate regulations promulgated under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq. at 40 C.F.R. 260 et seq. The RCRA regulations as cited herein shall also mean any applicable EPA authorized State RCRA Program(s). Compliance with the provisions of the NCP, 40 C.F.R. 300.440, is also mandatory.

- **Health and Safety Plan** - Site Health and Safety Plan (HSP) shall comply with 29 CFR 1910.120, and shall ensure the protection of the public health and safety during performance of on-Site work under this Order. The existing Site HSP may be updated as necessary to include the work to be performed.
- **Emissions Control Plan** - The emissions control plan describes methods to control volatile emissions from active work areas and material treating/staging areas. The emissions control plan shall include an air monitoring program.
- **Contingency Plan** - Describes the procedures to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or

non-sudden release of hazardous waste constituents to air, soil, or surface water. The contingency plan will provide detailed procedures to be followed in the event of a spill including, notification, containment, and cleanup. The plan will also describe the procedures to be followed for movement of equipment and personnel from low-lying areas during a high water event.

- **Schedule**

B. Mobilization and Site Preparation

Following written approval of the Removal Work Plan, the Respondents shall commence and fully implement all actions required under the Removal Work Plan, under the oversight of the OSC and any designated EPA representatives. Mobilization and site preparation will involve mobilizing personnel, equipment, supplies and incidentals onto the project site; establishing all offices and facilities necessary to implement the project; and preparation of the site for the construction work. The major components of site preparation are:

- Utility Connections - Supplying electrical and potable water sources within the work area limits.
- Clearing and Grubbing - Clearing and grubbing and/or mowing areas as required for access to the work and surrounding areas and for constructing roads, work areas, and staging areas.
- Temporary Road Construction - Constructing temporary roads as necessary to provide access and egress to the site, and access and egress to the work areas.
- Work/Staging Area - Constructing work, staging and containment areas.

C. Removal

The liquid and sludge/solid contents of the above ground storage tanks shall be removed from the tanks and either recycled or disposed of at an appropriate facility. Further, the tanks shall be decontaminated and removed from the Site. The removal method for the tank contents will be selected and implemented to control volatile emissions. The removal method will be determined after selection of the remedial contractor. Debris that is encountered will be removed by suitable methods and placed into lined roll-off containers that will be covered except while the debris is being added.

D. Emissions Control

An emissions control plan shall be implemented throughout the removal and material handling phases of the removal to control air emissions. The air exhaust from any vacuum trucks and any other exhaust that potentially could contain volatile emissions shall be captured and treated onsite with vapor-phase carbon.

E. Site Restoration and Demobilization

After completion of the removal action, the temporary roads and work areas will be dismantled and removed. Personnel, equipment, office trailer, supplies and incidentals that were used on the removal project will be removed from the site, unless required for the completion of other work at the Site.

F. Preparation of Final Removal Report

Following satisfactory completion of all removal activities required under the SOW, the Respondents shall prepare and submit to the OSC for review and approval a Final Removal Report describing all activities performed. The Final Report shall conform, at a minimum, with the requirement set forth in Section 300.165 of the NCP entitled "OSC" Reports." The Final Removal Report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Consent Order, a listing of quantities and types of materials removed off-site or handled on-site, a discussion of removal and disposal options considered for those materials removed, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action (*e.g.*, manifests, invoices, bills, contracts, and permits). The Final Removal Report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

"Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

H. Remedial Investigation and Feasibility Study

The Remedial Investigation and Feasibility Study (RI/FS) currently in progress pursuant to the UAO shall be completed for the Southern Area in accordance with the UAO and the approved RI/FS Workplan, except that the Southern Area RI/FS will only address the soil, surface water, and sediment media, and except that the schedule for the Southern Area RI/FS shall be modified as necessary to meet the conditions in the Southern Area. The required submittals are as follows:

- Schedule for the Southern Area RI/FS;
- Draft Preliminary Site Characterization Report;
- Final Preliminary Site Characterization Report;
- Draft Baseline Human Health Risk Assessment, which shall include a list of the Potential Chemicals of Concern and an Exposure Assessment;
- Final Baseline Human Health Risk Assessment;

- Draft Screening Level Ecological Risk Assessment;
- Final Screening Level Ecological risk Assessment;
- Draft Ecological Risk Assessment Problem Formulation & Work Plan, if necessary as determined by the approved Screening Level Ecological Risk Assessment;
- Final Ecological Risk Assessment Problem Formulation & Work Plan, if necessary;
- Draft Baseline Ecological Risk Assessment, if necessary;
- Final Baseline Ecological Risk Assessment, if necessary;
- Draft Remedial Investigation and Feasibility Study Report;
- Interim-Final Remedial Investigation and Feasibility Study Report.